

Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)	
Review of the Commission's Part 95 Personal Radio Services Rules)))	WT Docket No. 10-119
Petition for Rulemaking of Garmin International,)	RM-10762

COMMENTS ON PROPOSED RULE MAKING

My name is John Bridgeman. I currently hold a GMRS license (WPYN438) and reside in Saratoga, CA. I am a system trustee of Bay Area Repeater Net, which is an organization that serves Northern California with GMRS repeater stations for use by individuals, families, emergency service groups, and city-initiated organizations. I am writing to you today on behalf of Bay Area Repeater Net with its members and users (herein as BARN), in regards to the proposal of changes by the Commission to the Personal Radio Service.

In paragraph 26 of Station Licensing, it reads:

"For example, once authorized, a GMRS licensee may operate on any GMRS frequency; there is no requirement for frequency coordination; and none of the GMRS frequencies are assigned on an exclusive-use basis."

While this may be true, there are several unofficial coordinating bodies or organizations established throughout each individual state of the United States that help serve the GMRS licensed users and their repeater stations by coordinating frequencies and tones for each repeater system within the area or district of the licensee's state. This has proved to be effective and helps keep each repeater station free from interference of other existing or co-existing repeater stations.

In paragraph 26 of Station Licensing, it reads:

"Furthermore, we believe that licensing GMRS by rule would reduce administrative and other burdens on GMRS users, as well as on the Commission. For example, users would no longer be subject to application and regulatory fees, and would not be at risk of losing their authorization to operate for failing to file a timely renewal application."

To date, the GMRS license structure has proven to be effective in keeping users in check with the current rules and thus allowing them to abide by the rules provided by the FCC for use within the GMRS. It is not a burden among new or current licensees to have such a requirement for a license, and find that it benefits the users by having a license to use for such operations within the GMRS. By removing the requirement for license within the GMRS, this gives unwarranted permission to all users the option of following the rules associated within the GMRS and thus making the GMRS another unlicensed radio service much like the CB

radio service, where it will no longer be overseen by any official body or the FCC. It may also cause unwarranted actions during any crisis or coordinated emergency event that currently uses the GMRS as a means for communications among individuals, families, and city-initiated groups and organizations.

In paragraph 27 of Station Licensing, it reads:

"In view of the foregoing, we propose to eliminate the requirement for individual station licenses in the GMRS. Instead, we would, by rule, authorize operation of these stations without individual licenses. In addition, if GMRS is licensed by rule, GMRS operators would no longer receive call signs for their radios and we would, therefore, eliminate the station identification requirements in current section 95.119. As of the day the revised rules became effective, all existing GMRS licenses would be void. In addition, all pending applications for such licenses, and all applications for such licenses subsequently received, would result in no official Commission action.

Again, by removing the license requirement for the GMRS, all users would not adhere to or abide by the rules set in place for the GMRS. This will also affect the repeater stations that are currently in use by the licensed individuals and their families, and restrict access to these stations that are mandatory during city- or state-wide emergencies and disasters.

In paragraph 28 of Station Licensing, it reads:

"Alternatively, if we were to maintain the individual licensing requirement for all or some types of GMRS operations, we propose to extend the GMRS license term from five to ten years, to conform with most other wireless services, where the license terms have been extended from five to ten years. Extending GMRS license terms to ten years would decrease the administrative burden on both the general public and the Commission without, we believe, any adverse impact. It also would promote standardization of general licensing rules and streamlining of administrative requirements."

This decision would be effective in that it maintains the status of licensed users and allows them to continue to use the GMRS and adhere to the rules set forth. It would also allow a longer time frame to renew their license and not be as costly as it is in today's current requirements. This will benefit all GMRS licensees, both current and future, and the FCC licensing system.

In paragraph 29 of Eligibility, it reads:

"Under the current GMRS rules, only individuals who are 18 or older are eligible to obtain a GMRS license. An individual's family members of all ages may operate GMRS stations and units within a licensed system. Given that there is no age restriction on using radios in the other Personal Radio Services, we see no reason why, if we maintain the GMRS licensing requirement, younger individuals should be prohibited from operating a GMRS device or obtaining their own GMRS license."

I agree with this statement, as all users of all ages should have the opportunity to use the services of the GMRS. This has been successful within the Amateur Radio Service, and may prove to be beneficial for broken families or neglect children who wish to become involved with the GMRS.

In paragraph 30 of Eligibility, it reads:

"Furthermore, while individual licensees are permitted to use GMRS to communicate business activities, the rules have not permitted businesses to obtain GMRS licenses since July 31, 1987. If we license GMRS by rule, should we maintain the eligibility requirement that only individuals are permitted to operate GMRS or should we remove the prohibition on business use of GMRS devices?"

If this rule has been successful in the past and businesses have the option of using the FRS or obtain a Business Radio Service license, then allowing them to also use the GMRS would be futile and pointless as the GMRS was intended for communications between individuals and families, not businesses.

In paragraph 34 of GMRS Portable Devices, it reads:

"We also seek comment on power limits for other classes of GMRS operations. Most GMRS station classes currently may transmit with up to 50 watts output power. This is a relatively high power for stations that are not coordinated, and with the use of gain antennas, the actual radiated power could be much higher. Given that GMRS licenses are not issued on a coordinated or exclusive use basis, should we continue to permit 50-watt operations? Should the existing station classes and power limits be maintained?"

If, in fact, any and all GMRS repeater stations were to be coordinated, this change would not be applicable. Each repeater station would be coordinated in such a way as to not interfere with other surrounding GMRS repeater stations. The existing station classes and power limited should still be maintained, and should continue to permit 50-watt operations as this benefits repeater station operations. Current 50-watt stations have the advantage of allowing its signals to be heard at a greater range and to be heard in areas where signals may have a hard time reaching into (ie valleys, mountain ranges, forests or wooded areas, city blocks and inbetween buildings, etc).

In paragraph 34 of GMRS Portable Devices, it reads:

"We seek comment on whether repeater and base station operations are still needed in the GMRS given the availability of commercial alternatives that allow for more efficient use of the spectrum."

As stated previously, use of repeater stations are still needed and are beneficial to individuals, families, and local emergency groups and city-initiated organizations for casual two-way conversations and/or during city-or state-wide emergency events or disasters. Each repeater station operator has invested in well over \$3,000 to \$8,000 of equipment, including (but not limited to) monthly commercial repeater site costs solely for the use of GMRS licensed individuals and their families. By removing the use of repeater stations and base stations, it will limit contact between to individuals, families, and local emergency groups and city-initiated organizations and especially during a crisis when there is no available telephone service (both landline and cellular) or in rural areas where emergency services are already limited. Contact between the individuals and families with any and all emergency services that may be monitoring the GMRS during these events or disasters will be futile or unusable and may threaten or cause harm to ones life. This proves true if an individual or family lives in a remote area inaccessible by any telephone service (landline or cellular), emergency services, or physical contact with other individuals. Also, repeater station equipment will be useless and the amount of time and money put into these repeater stations will be futile.

In paragraph 37 of Narrowbanding GMRS Channels, it reads:

"Accordingly, we propose to implement 12.5 kHz narrowbanding in the GMRS. ... Therefore, we seek comment on the time that would be needed for GMRS manufacturers to transition to narrowband equipment if we adopt narrowbanding rules for GMRS. We would prohibit the marketing of 25 kHz GMRS equipment after that date. We request comment on whether this proposal would be overly burdensome on GMRS licensees, in particular repeater operators."

All repeater stations consist of equipment that were designed for use with a 25 kHz bandwidth. Requiring repeater station operators to change from 25 kHz to 12.5 kHz will be costly, tedious, and very stressful. Many of these repeater stations use equipment designed and built prior to 1998, such as the GE MASTR II series radios. By mandating the change to 12.5 kHz, all repeater station operators and owners will require an extended period of time of at least 2 years or more for adjustments to meet the new requirements.

In paragraph 41 of Garmin International, Inc. Petition for Rule Making, it reads:

"Several commenters oppose the Garmin petition in whole or in part. For example, the Personal Radio Steering Group (PRSG) acknowledges a role for the transmission of GPS information, but only

on the GMRS spectrum that is shared with FRS. It contends that the transmission of GPS data and text messages on the frequencies proposed by Garmin will interfere with GMRS operations, especially if operation is not subject to pre-transmission monitoring. The Northern California GMRS Users Group (NCGUG) states that while allowing location transmissions on GMRS channels would benefit the public, Garmin's approach "could open up potential loopholes" that could result in abuse and interference. Popular Wireless Magazines argues that allowing such operations will lead to more interference in the GMRS and generally agrees with NCGUG's comments. Garmin responds that the interference concerns raised by commenters largely relate to interference potential that is already present under the existing GMRS rules."

In agreeance with the PRSG, NCGUG, and the Popular Wireless Magazines, allowing data or text messages to be used on the GMRS frequencies would cause interference among current users for both simplex and repeater communications, despite the 1-second data burst adjustment. Data and/or text messages are currently available on most cellular devices and on some satellite phone devices. Claiming that "these benefits will be even greater in the GMRS because the higher power permitted in this service allows coverage over a larger area" should not apply or be acknowledged if user is operating these such devices in wooded or covered areas, as signal coverage will decrease significantly even with a higher power. Most all GPS or other satellite services are already inaccessible or unavailable as trees, foliage, or large structures block the signal. If interference potential is already present under the existing GMRS rules, then how can Garmin claim that by "allowing the transmission of GPS and text information be obtained while still maintaining the integrity of GMRS and without causing interference*" will not cause more interference to what is already present?

On mygmrs.com (an online GMRS repeater database), there are over 1720 registered GMRS users and over 380 registered GMRS repeaters. Of those 1720 registered users, 53 of them have networks (or multiple repeater systems covering a wide area). However, in the FCC database alone, there are well over 58,690 "W" callsigns and 1,459 "K" callsigns; all of which are still active and have not expired. While this radio service may not seem like it's needed or that it has noticable use among the people of this nation, I will say that on behalf of BARN, the owners of repeater stations, city organizations, emergency services, etc, if this radio service is eliminated, changed drastically, or repeater stations are no longer allowed, it will do a great disservice to those who depend on it every day. This is especially true with the small communities that BARN currently serves, where they do not have cellular coverage or multiple access points going into or coming out of the towns. The town of New Almaden is an excellent example. New Almaden does not have cellular coverage, and there's only one way in from the main road. Next to the town is a county park where hundreds of people visit each year. Without the use of a GMRS repeater (which BARN currently covers), people who may be in need of medical or emergency services may be at a loss and may not be able to call for help when needed.

So far, among all of the letters the FCC has received, almost all of them state at one time or another that the GMRS is a valuable resource and a valuable tool to them and their families, to their city, and especially to those who do not have an outside source of communications (such as cellular phones, internet, or landline phones).

In closing, if the FCC were to eliminate repeater stations, or make the GMRS a license-by-rule service, it would be a great mistake, a great tradgedy, and would leave hundreds in the dark. Please do not allow this to happen, as we rely on this service to be there for us, 24/7. -- I would like to thank the Commission for reviewing this matter and allowing the users and licensees of the GMRS to comment with their concerns regarding this change.

Thank you for your time,

John Bridgeman - WPYN438 System Trustee

^{*}Paragraph 40 of Garmin International, Inc. Petition for Rule Making